



U.S. Department of Justice

United States Attorney's Office
District of New Jersey

U.S. Mail: 970 Broad Street 7th Floor
Newark, New Jersey 07102
Telephone: (973) 645-2700

Civil Rights Division

U.S. Mail: Office of the Assistant Attorney General
950 Pennsylvania Avenue, NW - RFK
Washington, DC 20530
Telephone: (202) 514-2151

September 30, 2022

BY ECF

Hon. Zahid N. Quraishi
United States District Judge
United States District Court
402 E. State Street
Trenton, New Jersey 08608

Re: United States v. State of New Jersey, et al. (21-cv-15031)

Dear Judge Quraishi:

At the request of Monitor Jane Parnell, and pursuant to paragraph 114 of the Settlement Agreement and Consent Decree, *see* ECF No. 12, the parties jointly submit the Monitor's proposed budget to the Court for its approval. Counsel for Defendants has reviewed and consents to this submission to the Court.

Respectfully Submitted,

Steven H. Rosenbaum
Chief, Special Litigation Section
Civil Rights Division

Philip R. Sellinger
United States Attorney
District of New Jersey

By: /s/ Kerry Dean
Kerry Dean
Deputy Chief

By: /s/ Kelly Horan Florio
Kelly Horan Florio
Senior Civil Rights Counsel

cc: Matthew Boxer, Esq.
Rachel Moseson Dikovics, Esq.

Proposed Monitoring Budget

This is an estimated budget for time and travel costs. All reimbursements for travel will be based on actual costs. The monitor will make every effort to obtain the Federal per diem for hotel rates. Reimbursements for professional fees of \$200 per hour are based on actual hours worked and all invoices will include a detailed account of hours and work provided.

Date/ Monitoring Activity	Site Visits	Site Visit #Hours	Fee-\$200/hour	Work at Home #Hours	Fee-\$200/hour	Supplemental Assistance	Total All Activity Costs
Description	Description	Hours	Total Cost	Hours	Total Cost	Cost	Total
August 2022. Review documents sent by NJDOC. Prepare list of persons to interview, questions to ask, and documents to review during September compliance visit. Begin drafting narrative compliance report and monitoring tool for 2nd				60	\$12,000.00		\$12,000.00
Sept 2022 -Review documents sent by NJDOC to ensure compliance with Settlement agreement . Prepare for compliance visit and begin drafting 2nd compliance report. Compliance Visit September 11 - 16. 6 days/5 nights. Travel Expenses:	September 11 - 16	60	\$14,340.00	40	\$8,000.00		\$22,340.00

October 2022 - Finalize Compliance Report and Monitoring Tool. Continue all activities that support compliance assessment. Continue to review and provide feedback on training curriculum and Level 1 and III policies. Phone calls, emails, and conference calls with the DOJ and NJDOC. Est 60 hours				80	\$16,000.00		\$16,080.00
November/December 2022 and January 2023 - Phone calls, emails, and conference calls with the DOJ and NJDOC. Review documents. Continue all activities that support compliance assessment. Continue to review and provide feedback on training				180	\$36,000.00		\$36,000.00
February 2023 - Review documents sent by NJDOC. Prepare list of persons to interview, questions to ask, and documents to review during March 2023 compliance visit. Begin drafting narrative				80	\$16,000.00		\$16,000.00

<p>March 2023 - Review documents sent by NJDOC to ensure compliance with Settlement agreement . Prepare for compliance visit and begin drafting 3rd compliance report. Compliance Visit - 6 days/5 nights. Travel Expenses: Airfare \$600.00; Hotel \$800.00; Per Diem \$400.00; Rental Car/Gas/Parking \$600.00; Note: will bill for actual costs</p>	On Site Visit - 6 days/5 nights	60	\$14,400.00	40	\$8,000		\$22,400.00
<p>April 2023 - Finalize 3rd Compliance Report and Monitoring Tool. Continue all activities that support compliance assessment. Continue to review and provide feedback on training curriculum and Level 1 and III policies. Phone calls, emails, and conference calls with the DOJ and NJDOC.</p>				70	\$14,000.00		\$14,000.00
<p>May, June, and July 2023 - Work at home. Phone calls, emails, and conference calls with the DOJ and NJDOC. Continue all activities to support compliance assessment. Continue to review and provide feedback on training curriculum and Level 1 and III policies. Estimate 60 hours/month</p>				180	\$36,000.00		\$36,000.00

Outside Assistance-Clerical, Other Correctional Consultants, Editor (as needed), Rates vary. Average \$125.00/hour				80		\$10,000.00	\$10,000.00
Totals		120	\$28,740.00	648	\$146,000.00	\$10,000.00	\$184,820.00

SO ORDERED:
s/ Zahid N. Quraishi, U.S.D.J.
Dated: 10/3/2022